

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LIGHTHOUSE FINANCIAL GROUP,
Individually and on Behalf of All Others
Similarly Situated, : Civil Action No. 1:11-cv-00398-GBD
: CLASS ACTION
: .
: .
: .

Plaintiff,

vs.

THE ROYAL BANK OF SCOTLAND
GROUP, PLC, et al., : .
: .
: .

Defendants.

ETHAN GOLD, Individually and on Behalf of
All Others Similarly Situated, : Civil Action No. 1:11-cv-01162-NRB
: CLASS ACTION
: .
: .
: .

Plaintiff,

vs.

THE ROYAL BANK OF SCOTLAND
GROUP, PLC, et al., : .
: .
: .

Defendants.

x

PLAINTIFFS' NOTICE OF MOTION TO STRIKE CERTAIN EXTRANEous MATERIAL
CITED IN DEFENDANTS' MOTIONS TO DISMISS THE CONSOLIDATED AMENDED
COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Points and Authorities in Support of Motion to Strike Certain Extraneous Material Cited in Defendants' Motion to Dismiss the Consolidated Amended Complaint, and all other papers and proceedings herein, Lead Plaintiff IBEW Local Union No. 58 Pension Trust Fund and Annuity Fund and additional plaintiffs City of Taylor and Ute Mountain Ute Tribe shall jointly move this court before the Honorable George B. Daniels, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an Order striking Exhibits 7, 10, 14, 19-20, 27-28, 31-32, 35-36, 43-44, 46-47, 50-52, 55-57, 59, 71-92, 94-147, 152-182, and 190-191 attached to the Declaration of Shauna K. Friedman pursuant to Fed. R. Civ. P. 12(d) and relevant authority, and for such other relief as the Court deems just.

DATED: March 13, 2012

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
THEODORE J. PINTAR
JASON A. FORGE
DARRYL J. ALVARADO

s/ DARRYL J. ALVARADO
DARRYL J. ALVARADO

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 13, 2012.

s/ DARRYL J. ALVARADO
DARRYL J. ALVARADO

ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-3301
Telephone: 619/231-1058
619/231-7423 (fax)

E-mail: DAlvarado@rgrdlaw.com

Mailing Information for a Case 1:11-cv-00398-GBD

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Darryl J. Alvarado**
dalvarado@rgrdlaw.com,nhorstman@rgrdlaw.com
- **Charles H. Dufresne , Jr**
cdufresne@sglawyers.com
- **Paul Adam Engelmayer**
paul.engelmayer@wilmerhale.com
- **Jason A. Forge**
jforge@rgrdlaw.com,tholindrake@rgrdlaw.com
- **Shauna Kathleen Friedman**
shauna.friedman@wilmerhale.com
- **D. Seamus Kaskela**
skaskela@ktmc.com
- **Thomas Livezey Laughlin , IV**
tlaughlin@scott-scott.com,efile@scott-scott.com
- **David Sapir Lesser**
david.lesser@wilmer.com,lesserda@yahoo.com
- **James Stuart Notis**
jnotis@gardylaw.com
- **Theodore J. Pintar**
tedp@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Andrea J. Robinson**
andrea.robinson@wilmerhale.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **David R. Scott**
drscott@scott-scott.com,efile@scott-scott.com
- **Robert Walter Trenchard**
robert.trenchard@wilmer.com
- **Curtis Victor Trinko**
ctrinko@gmail.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Ethan Gold

,

David M. Promisloff

Kessler Topaz Meltzer & Check, LLP
280 King of Prussia Road
Radnor, PA 19087